

City of Portland

Bureau of Development Services

Land Use Services Division

1900 SW Fourth Ave. Suite 5000 Portland, Oregon 97201

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Date: August 28, 2008 **To:** Interested Person

From: Emily Hughes, Land Use Services

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NOTICE OF A TYPE I DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has approved a proposal in your neighborhood. The reasons for the decision are included in this notice. If you disagree with the decision, you can appeal it to the Oregon Land Use Board of Appeals (LUBA) at 550 Capitol St. NE, Suite 235, Salem, OR 97301. The phone number for LUBA is 1-503-373-1265. Information on how to appeal this decision is listed at the end of this notice.

CASE FILE NUMBER: LU 08-126577 LDP

GENERAL INFORMATION

Applicant: Lynn Cox, LHC Enterprises, Llc

Po Box 90547

Portland OR 97290-0547

Owner: Kenneth L Leach

39501 NE 12th Ave

Woodland, Wa 98674-3606

Site Address: 11833 SE BOISE ST

Legal Description: LOT 1 BLOCK 2, CAMPAU SQUARE

Tax Account No.: R130700700 **State ID No.:** R130700700 1S2E10DD 00900

Quarter Section: 3442

Neighborhood: Powellhurst-Gilbert, contact James Chasse at 503-762-0863.

Business District: Midway, contact Donna Dionne at 503-252-2017.

District Coalition: East Portland Neighborhood Office, contact Richard Bixby at 503-823-

4550.

Plan District: Johnson Creek Basin Plan District

Zoning: R2a, Multi-dwelling Residential 2,000 square feet, "a" Alternative

Design Density Overlay

Case Type: LDP, Land Division Partition

Procedure: Type I, an administrative decision with appeal to the Oregon Land Use

Board of Appeals (LUBA).

Proposal:

The applicant proposes to divide this 7,377 square foot site into 3 lots. Parcel 2 is proposed to retain the existing house. Parcels 1 and 3 will be eligible for one single dwelling residence. The existing shed on Parcel 1 is proposed to be removed. The applicant is proposing to use the Tree Mitigation Option (33.630.600) and proposes to plant one two-inch tree on each parcel, and one additional on-inch tree on Parcel 1. The R2 zone allows one dwelling unit per 2,000 square feet of land area, and has a minimum lot size of 1,600 square feet for

single dwelling development. This review is processed as a Type I procedure because it is for 2-3 parcels not located in a Potential Landslide Hazard Area.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are:

33.660.120, Approval Criteria for Land Divisions in Open Space and Residential Zones.

ANALYSIS

Site and Vicinity: The site is located on the northeast corner of SE Boise Street and SE 118th Place. Southeast Boise Street is developed with single dwelling residences, 1-2 stories, on lots ranging from 5,000-15,000 square feet. Southeast 118th Place is a dead end street developed with single-dwelling residences, 1-2 stories, on lots ranging from 4,000 to 10,000 square feet. The terminus of SE 118th Place is developed with a large multi-dwelling development. Along the abutting southern side of SE Boise Street is an 18-lot subdivision developed with pairs of attached houses. The majority of the street frontages in the vicinity are developed with curb and intermittent sidewalks. The site itself is flat and developed with a single-dwelling residence, driveway, and accessory shed.

Zoning: The site is zoned R2, Multi-dwelling Residential, 2,000 square feet, with an "a" Alternative Design Density overlay zone. The R2 zone allows for one dwelling unit per 2,000 square feet of site area. The "a" overlay allows additional density, or dwelling units, than is allowed by the R2 zone in exchange for additional design standards at time of development. This proposal does NOT utilize any of the provisions of the "a" overlay zone. The R2a zone

Land Use History: City records indicate there are no prior land use reviews for this site.

Agency Review: A Notice of Proposal in your Neighborhood was mailed on **July 16, 2008**. See discussion under "Approval Criteria" below for comments from City agencies.

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on **July 16, 2008**. Two written responses have been received from notified property owners in response to the proposal. A summary of the comments follows.

- Concern regarding effect on property taxes for adjacent properties;
- Concern regarding effect of property values for the subject site;
- Concern regarding disruption of traffic during construction of future development;
- Concern regarding costs for repaying after construction;
- Inquiry about timeline for proposed project;
- Concern that the proposal does not fit in well with existing development;
- Concern regarding small size of parcels;
- Concern regarding safety issues at intersection of SE 118th Place and Boise due to increased traffic serving the subject site;
- Concern regarding effect on parking, particularly on SE 118th Place;
- Concern regarding potential scale of future development, specifically in terms of height; and
- Concern regarding recent (approximately within the last decade) addition of additional houses and multi-dwelling development in the vicinity.

Staff Response:

The general timeline for development is dependant almost entirely on the applicant. After this decision is rendered, the applicant has up to 3 years to apply for final plat approval, during which time compliance will all conditions of approval required prior to final plat approval at the end of this report will be verified. It is up to the applicant to pursue compliance with these conditions. Building permits may be applied for when the final plat is

in an approvable state, and building permits may be issued after the final plat is approved by the City and recorded at Multnomah County.

The effect of the proposal on property taxes or property values is not in the purview of the review as those issues don't affect development standards for future development or approval criteria for the land division review itself. Though also not relevant to the land division review itself, it can be noted that the applicant is responsible for obtaining appropriate right-of-way permits for blocking portions of the street during construction. Since the curb is existing, and the only additional construction related to the right of way is the installation of sidewalks, it is anticipated that little or no damage to the right-of way will be incurred. However, should damage or destruction occur the applicant is liable to return the right of way to its original condition prior to the completion of construction at their expense.

The surrounding development is currently comprised largely of single dwelling residences on larger lots that are proposed at this site (with the exception of the subdivision south of SE Boise, just to the east of the site). However, the general vicinity is zoned R2 which allows small lot sizes at a density of one unit per 2,000 square feet of land area by right. Similarly, though most of the surrounding development is developed with one to two story houses, the height limit of the R2 zone is 40', by right, measured to the midpoint of the highest gable on a roof with a pitch of 12/12 or less. Compatability with current neighborhood context is not part of the approval criteria for the land division review. Though these considerations are not part of this land division review, it can be noted that at the time of development the proposed buildings will be reviewed for conformance with the development standards for the R2 zone. These standards include not only height limits, but setback requirements, and building coverage limitations as well. In summary, the future development is not the subject of this review. However, it is important to note that the proposal is consistent with the purpose of the R2 zone, zone anticipates incremental change over time in terms of future development.

Regarding traffic and parking, the Office of Transportation has reviewed the proposal and determined that, with improvements, the proposal can maintain current levels of service with the addition of two potential dwelling units. See discussion below under Transportation Impacts. One of the requirements of Transportation is the posting of "no parking" signs along both the SE Boise and SE 118th Street frontages of the site, where the street is of a substandard width to accommodate two lanes of on-street parking. This should alleviate congestion and sight difficulties at the intersection. The retention of one lane of on-street parking will be sufficient for the accomodation of general parking needs, especially since each house is required to provide one on-site parking space. In addition, sidewalk improvements and the requirement of an ADA compliant ramp and the corner of SE 118th & SE Boise will be required and will enhance pedestrian safety near this intersection.

APPROVAL CRITERIA-

APPROVAL CRITERIA FOR LAND DIVISIONS IN OPEN SPACE AND RESIDENTIAL ZONES

33.660.120 The Preliminary Plan for a land division will be approved if the review body finds that the applicant has shown that all of the following approval criteria have been met.

The relevant criteria are found in Section **33.660.120 [A-L], Approval Criteria for Land Divisions in Open Space and Residential Zones**. Due to the specific location of this site, and the nature of the proposal, some of the criteria are not applicable. The following table summarizes the applicability of each criterion.

Criterion	Code Chapter	Topic	Applicability Findings
A	33.612	Lots	Applicable - See findings below

Criterion	Code Chapter	Topic	Applicability Findings
В	33.630	Trees	Applicable - See findings below.
С	33.631	Flood Hazard Area	Not applicable - The site is not within the flood hazard area.
D	33.632	Potential Landslide Hazard Area	Not applicable - The site is not within the potential landslide hazard area.
Е	33.633	Phased Land Division or Staged Final Plat	Not applicable - A phased land division or staged final plat has not been proposed.
F	33.634	Recreation Area	This is not required when the minimum density for the site is less than 40 units.
G	33.635 .100	Clearing and Grading	Applicable - See findings below.
G	33.635 .200	Land Suitability	Applicable - See findings below.
Н	33.636	Tracts and Easements	Applicable - See findings below.
I	33.639	Solar Access	Not Applicable - Maintaining existing development on the site limits new parcel configuration (33.610.200 supercedes 33.639).
J	33.640	Streams, Springs, and Seeps	Not applicable - No streams, springs, or seeps are evident on the site.
K	33.641	Transportation Impacts	Applicable - See findings below
L	33.651 - 33.654	Services and Utilities	Applicable - See findings below

Applicable Approval Criteria are:

A. Lots. The standards and approval criteria of Chapters 33.605 through 33.612 must be met.

Findings: Chapter 33.612 contains the lot standards applicable in the Multi-dwelling zones. These density and lot dimension standards ensure that lots are consistent with the desired character of each zone while allowing lots to vary in size and shape provided the planned intensity of each zone is respected.

Density Standards

Density standards match housing density with the availability of services and with the carrying capacity of the land in order to promote efficient use of land, and maximize the benefits to the public from investment in infrastructure and services. These standards promote development opportunities for housing and promote urban densities in less developed areas. Maximum densities ensure that the number of lots created does not exceed the intensity planned for the area, given the base zone, overlay zone, and plan district regulations. Minimum densities ensure that enough dwelling units can be developed to accommodate the projected need for housing.

When single-dwelling or duplex development is proposed for some or all of the site, the applicant must show how the proposed lots can meet minimum density and not exceed the maximum density stated in Table 120-3. When development other than single-dwelling or duplex development is proposed, minimum and maximum density must be met at the time of development

The total site area shown on the applicant's survey is 7,377 square feet. Site area devoted to streets is subtracted from the total site area in order to calculate the minimum and maximum density. No new streets or public street dedications are proposed with this land division.

In this case, Parcels 1, 2, and 3 are proposed for single dwelling development. Therefore, the density requirements for this site are calculated as follows:

Minimum = 7,377 (site area) $\div 2,500$ (minimum density from Table 120-3) = 2.95 (which rounds up to a minimum of 3 units, per 33.930.020.A).

Maximum = 7,377 (site area) $\div 2,000$ (maximum density from Table 120-3) = 3.68 (which rounds down to a maximum of 3 units, per 33.930.020.B).

The applicant is proposing 3 lots. The density standards are therefore met.

Lot Dimensions

The lot dimensional standards ensure that: (1) Each lot has enough room for development that meets all the requirements of the zoning code; (2) Lots are an appropriate size and shape so that development on each lot can be oriented toward the street as much as possible; (3) The multi-dwelling zones can be developed to full potential; and (4) Housing goals for the City are met.

The dimensions of the proposed lots as compared to the required lot dimension standards is shown in the following table (this information is found in Chapter 33.612 of the Zoning Code):

	R2 Zone Requirement	Proposed Parcel 1	Proposed Parcel 2	Proposed Parcel 3
Lots for Attached or				
Detached Houses		_		
Minimum Lot Area	1,600 sq. ft.	2,038 sq. ft.	3,319 sq. ft.	2,020 sq. ft.
Minimum Lot Width*	none	21 ft.	52 ft.	35 ft.
Minimum Lot Depth	none	71 ft.	71 ft.	51 ft.
Minimum Front Lot Line	10 ft.	40.4 ft.	31.3 ft.	29.9 ft.
			11.0 ft.	

^{*}Width is measured from the midpoints of the side lot lines.

The findings above describe how the applicable lot standards are met. This criterion is therefore met.

B. Trees. The standards and approval criteria of Chapter 33.630, Tree Preservation, must be met.

Findings: The regulations of Chapter 33.630 preserve trees and mitigate for the loss of trees. Certain trees are exempt from the requirements of this chapter.

The applicant has submitted an arborist report that inventories the trees within the land division site, evaluates their condition and specifies root protection zones (Exhibit G.3). Some trees have been exempted by the arborist because they are either too small, unhealthy, a nuisance species, located partially off the property or located within 10 feet of an existing structure to remain on the property. The inventory identifies the following trees on the site:

Tree #	Species		Significant? (On Table 630-1)	Exempt? (per 33.630.030)	To be retained?	RPZ (Root Protection Zone)
1	Norway maple	16.5	N	Yes, nuisance.	No	N/A
2	Norway maple	8.5	N	Yes, nuisance.	No	N/A

3	Flowering Plum	20	Yes	No	No	N/a
4	l Douglas fir	unknown	unknown	Yes, hazard.	No	N/A
					(removed)	

The total non-exempt tree diameter on the site is 20 inches. However, the root protection zone of the 20" Flowering plum will be encroached by any proposed building on Parcel. The applicant proposes instead to use the mitigation options of 33.630.300:

33.630.300 Mitigation Option

As an alternative to meeting Section 33.630.100, approval of a mitigation plan may be requested. The review body will approve the mitigation plan where the applicant has shown that the applicant has met criteria A. and B. and one of the criteria in C., below:

- A. As many trees as possible are preserved; and
- B. The applicant has submitted a mitigation plan that adequately mitigates for the loss of trees, and shows how the mitigation plan equally or better meets the purpose of this chapter. Mitigation can include tree planting, preservation of groups of smaller trees, eco-roof, porous paving, or pervious surface permanently preserved in a tract.
- C. It is not possible under any reasonable scenario to meet Section 33.630.100 and meet one of the following:
 - 1. Minimum density;
 - 2. All service requirements of Chapters 33.651 through 33.654, including connectivity;
 - 3. Implementation of an adopted street plan;
 - 4. On sites 15,000 square feet or less in area, a practicable arrangement of lots, tracts, and streets within the site that would allow for the division of the site with enough room for a reasonable building site on each lot;
 - 5. In E and I zones, provide a practicable arrangement of lots, tracts, and streets within the site that would allow for the division of the site with enough room for a reasonable building site on each lot, considering the uses and development allowed in the zone; or
 - 6. Preserve the trees within the environmental zones on site while providing a practicable arrangement of building sites and disturbance area.

The site is less than 15,000 square feet in area. The applicant wishes to divide the site for detached housing, which is an allowed housing type in the R2 zone. The location of the existing trees on the site would prevent a land division that would result in a practicable arrangement of lots that could each contain a reasonable building area and still be able to meet the development standards of the R2 zone. Criterion C.4 above is met.

Preservation of the existing non-exempt tree precludes the practical arrangement of lots in a way that is not possible to preserve the tree. Therefore, the applicant has meet Criteria A, because as many trees as possible will be preserved.

The applicant has submitted a tree mitigation plan that proposes planting (1) 2-inch tree on each of the three parcels, and an additional 1" tree on Parcel.

The mitigation plan provides for approximately the same caliper inches as Option 1 of the Tree Preservation Chapter. Option 1 would require that 35% or 7 inches of the existing tree diameter on site be preserved. The addition of 3 trees at a minimum 2" each, and 1 tree at a minimum 1" inches is equivalent to the 7 inches that would be required to be preserved. However, the required tree planting size per Title 33 is 1.5 inches. Therefore, that tree should be changed to be a minimum of 1.5" at planting. The dispersion of the mitigation trees allows more areas of the site to reap the benefits of trees that are described in the purpose statement for the Tree Preservation Chapter. The addition of 1 extra tree on Parcel 1 is appropriate since that lot contains open area in the rear of the lot most likely not suitable for building area. In addition, the trees will grow over time to provide additional benefits.

Section 33.248.020.H, known as the T1 tree planting standard, requires trees to be planted on new lots as part of the approval of future building permits. The T1 tree standard requires the planting of at least 2 inches of tree caliper per 1,000 square feet of site area, which would result in 3 inches of new trees planted for each of the proposed lots. Because of the small size of the parcels it is not practical for additional trees beyond the T1 standard to be planted without jeopardizing the overall health of all of the trees on the site. Therefore, the mitigation trees may be counted toward meeting the T1 requirement on the new lots.

Criteria B is met with a condition of approval requiring one 2" tree to be planted on Parcel 2, the lot with the existing house, prior to final plat approval. A Zoning Permit must be obtained, and receive final inspection approval verifying that these trees have been planted. In addition, (1) 2" tree must be planted on Parcel 3, and (1) 2" and (1) 1.5" tree must be to be planted on Parcel 1 prior to final building permit approval for new houses on these lots.

G. Clearing, Grading and Land Suitability. The approval criteria of Chapter 33.635, Clearing, Grading and Land Suitability must be met.

The approval criteria of Chapter 33.635 are found in two groups – clearing and grading, and land suitability.

33.635.100 - Clearing and Grading

- A. Existing contours and drainage patterns of the site must be left intact wherever practicable. Where alteration to existing drainage patterns is proposed, it must not adversely impact adjacent properties by significantly increasing volume of runoff or erosion;
- B. Clearing and grading should be sufficient for construction of development shown on the Preliminary Clearing and Grading Plan;
- C. Clearing and grading should be limited to areas of the site that are reasonably necessary for construction of development shown on the Preliminary Clearing and Grading Plan;
- D. Topsoil must be preserved on site to the extent practicable for use on the site after grading is complete; and
- E. Soil stockpiles must be kept on the site and located in areas designated for clearing and grading as much as is practicable.

Findings: The regulations of Chapter 33.635 ensure that the proposed clearing and grading is reasonable given the infrastructure needs, site conditions, tree preservation requirements, and limit the impacts of erosion and sedimentation to help protect water quality and aquatic habitat. In this case the site is primarily flat, and is not located within the Potential Landslide Hazard Area. Therefore, no significant clearing or grading will be required on the site to make the new lots developable. In addition, there are no trees required to be preserved in the areas where new development on the site is anticipated. These criteria are met.

33.635.200 - Land Suitability

Where geologic conditions or historic uses of the site indicate a hazard may exist, the applicant must show that the proposed land division will result in lots that are suitable for development. The applicant may be required to make specific improvements in order to make the lots suitable for their intended uses and the provision of services and utilities.

The site is currently in residential use, and there is no record of any other use in the past. Although the site is currently connected to the public sanitary sewer, there is an old septic system on the site. The City has no record that this facility was ever decommissioned. Prior to final plat, the applicant must meet the requirements of the Site Development Section of the Bureau of Development Services for the decommissioning of this facility. With this

condition, the new lots can be considered suitable for new development, and this criterion is met.

- H. Tracts and easements. The standards of Chapter 33.636, Tracts and Easements must be met;
 - 33.636.100 Requirements for Tracts and Easements
 - A. Ownership of tracts. Tracts must be owned as follows unless otherwise specified in this Title or the land use decision:
 - 1. The owners of property served by the tract, or by any other individual or group of people. When the tract is owned by more than one person it must be held in common with an undivided interest;
 - 2. The Homeowners' Association for the area served by the tract;
 - 3. A public or private non-profit organization; or
 - 4. The City or other jurisdiction.

Findings: No tracts are proposed or required for this land division, so criterion A does not apply.

B. Maintenance agreement. The applicant must record with the County Recorder a maintenance agreement that commits the owners or owners' designee to maintain all elements of the tract or easement; however, facilities within the tract or easement that will be maintained by a specified City agency may be recorded in a separate maintenance agreement. The maintenance agreement must be approved by BDS and the City Attorney in advance of Final Plat approval and must be submitted to the County Recorder to be recorded with the Final Plat. For a Planned Development not done in conjunction with a land division, the maintenance agreement must be submitted to the County Recorder to be recorded prior to issuance of the first building permit related to the development.

Findings: The following easements may be required for this land division:

- If the applicant does not remove the portions of the driveway currently serving Parcel 2 that are located on Parcel 3, an Access Easement for the benefit of Parcel 2 to use the portions of the driveway serving Parcel 2 that cross over Parcel 3 or a Reciprocal Access Easement is proposed to allow shared use of a driveway that will straddle proposed lot lines between Parcels 2 and 3;
- A Private Sanitary Sewer Easement may be required across the relevant portions of Parcel 1 or 3, for a sanitary sewer lateral connection that will serve Parcel 2, depending on the location of the lateral.

As stated in Section 33.636.100 of the Zoning Code, a maintenance agreement(s) will be required describing maintenance responsibilities for the easements described above and facilities within those areas. This criterion can be met with the condition that a maintenance agreement(s) is prepared and recorded with the final plat. In addition, the plat must reference the recorded maintenance agreement(s) with a recording block for each agreement, substantially similar to the following example:

"A Declaration of	`Maintenance agreement fo	r (name of	feature)	has beer	ı recorde	d as
document no	, Multnomah Count	y Deed Re	cords."			

With the conditions of approval discussed above, this criterion is met.

K. Transportation impacts. The approval criteria of Chapter 33.641, Transportation Impacts, must be met; and,

The relevant approval criteria of Chapter 33.641 are found in the two paragraphs below.

33.641.020. The transportation system must be capable of safely supporting the proposed development in addition to the existing uses in the area. Evaluation factors include: street capacity and level-of-service; vehicle access and loading; onstreet parking impacts; the availability of transit service and facilities and connections to transit; impacts on the immediate and adjacent neighborhoods; and safety for all modes.

33.641.030. The applicant may meet the criterion in Section 33.641.020, above, by including mitigation measures as part of the land division proposal. Mitigation measures must be acceptable to the City Engineer and may include providing transportation demand management measures, an access management plan, constructing streets or bicycle, pedestrian, or transit facilities on or off the site or other capital improvement projects such as traffic calming devices.

Findings: The regulations of Chapter 33.641 allow the traffic impacts caused by dividing and then developing land to be identified, evaluated, and mitigated for if necessary. Small land divisions involving only a few dwelling units may not require a formal transportation impact study, while it might be required for larger projects (Title 17 includes technical standards describing when a more formal study is required).

The site has approximately 68 feet of frontage on SE Boise Street. Southeast Boise Street is designated a local service street for all modes in the Transportation System Plan. In addition, the site has approximately 101 feet of frontage on SE 118th Place. Southeast 118th Place is classified as a local service street for all modes in the Transportation System Plan. Tri-Met provides transit service approximately 800 feet from the site on SE 122nd Avenue via bus number 71. Parking is currently allowed on SE Boise Street on both sides. There is one driveway entering the site from SE Boise Street that provides access to off-street parking for the existing house.

Southeast Boise Street is and improved 50-foot right of way with a paved roadway narrowing from 28 feet to 25 feet adjacent to the site, which does not meet City standards for roadway width supporting parking in both directions. The existing pedestrian corridor improvements along this frontage consist of curb-only with an unimproved (no sidewalks) pedestrian corridor of 16', wider than the recommended corridor of 11 feet. This is due to the curb extension provided along the site's frontage on SE Boise Street, which also accounts for the narrower than required paving width adjacent to the site.

Based on the classification of local service street, the Portland Pedestrian Design Guide recommends a curb, 6-foot sidewalk, and 4-foot planter strip. Sidewalk improvements must be installed on the frontage of Parcel 2 along SE Boise Street prior to final plat approval. Sidewalk improvements on the frontage of Parcel 3 along SE Boise Street will be required at time of building permit for new construction on Parcel 3.

The existing curb alignment to the west side of SE 118th Place matches this frontage's curb alignment along SE Boise Street. Additional dedication and reconstruction of this curb alignment to provide additional roadway width at this location would place the intersection out of alignment and create a situation that causes narrowing through the intersection in the direction of westward traffic flow. This is not advisable, therefore no dedication is required. However, because the roadway width is less than what is required to support parking on both sides, "no parking signs" will be required to be posted along the SE Boise Street frontage.

The applicant voluntarily provided a conceptual parking plan for Parcel 3. Transportation has indicated that a paired driveway serving Parcels 2 and 3 is not acceptable. The applicant must demonstrate forward motion egress onto SE Boise Street for both Parcels 2 and 3 and/or provide a 5-foot wide or large continuous curb separation between approaches. Additionally, if a parking pad only (no garage) is provided on Parcel 3, the length of the parking pad for Parcel 3 should be at least 28' in length measured from the back of sidewalk

(and 23' from the property line to meet requirements of Title 33). Transportation would also support an access easement for a single shared driveway between Parcels 2 and 3 that would provide forward motion access to SE Boise Street. These comments are based on the voluntary parking plan provided by the applicant and are not required to be addressed as part of the land division. However, the comments should be a reference to requirements at time of future development of Parcel 3.

Southeast 118th Place is improved with a 28' paved roadway within a 50-foot right of way and curb. The 28' paved roadway does not meet City standards to support parking on both sides of the street. However, additional dedication and reconstruction of the curb and street to provide additional roadway width at this location would not be practical, given that the existing street width does meet standards for one lane of on-street parking. However, "no parking" signs must be posted on the SE 118th Place frontage.

Based on the Portland Pedestrian Design Guide, the pedestrian corridor along SE 118th Place should consist of a curb, a 4-foot planter strip, and a 6-foot sidewalk. However, the existing pedestrian corridor improvements adjacent to the parcel to the north of the site consiste of a curb, 5-foot planter strip, and 5-foot sidewalk. Because the site is adjacent to the last segment of unimproved frontage on the east side of SE 118th Place, which also terminates at the intersection with SE Boise Street, it would not be practical to require a change from the existing pedestrian corridor configuration at this location. Therefore, the required pedestrian corridor will be curb, 5-foot planter strip, and 5-foot sidewalk. The improvements adjacent to Parcel 2 must be made prior to final plat approval. The improvements for Parcel 1, and the frontage of Parcel 3 adjacent to SE 118th Place will be made at time of building permit for new construction. It should be noted that at the time of the development of Parcel 3 and the associated improvements, an ADA compliant ramp will be required at the corner of the intersection of SE Boise Street and SE 118th Place.

Finally, Transportation noted that portions of the existing fence are located within the right-of-way. Prior to final plat approval, the fence will be required to be modified to be in compliance with standards for fence height and location. The fence must be removed from the right-of-way or obtain an encroachment permit. In addition, Title 33 requires that fences within the front setback are limited to 3.5' in height.

In reviewing this land division, Portland Transportation relies on accepted civil and traffic engineering standards and specifications to determine if existing street improvements for motor vehicles, pedestrians and bicyclists can safely and efficiently serve the proposed new development. In this case Portland Transportation has determined that curb and sidewalk improvements must be made in order to ensure that safe pedestrian travel is possible within the proposed development. In addition, "no parking" signs along the SE Boise and SE 118th Place frontages will ensure safe motor vehicle travel along the substandard portion of those streets. Finally, the existing fence must be brought into conformance with standards of Title 17 and Title 33 for fence height and location on Parcels 1, 2 and 3. With those improvements, two additional dwellings can be safely served by this existing street without having any significant impact on the level of service provided.

With the conditions of approval described above, this criterion is met.

L. Services and utilities. The regulations and criteria of Chapters 33.651 through 33.654, which address services and utilities, must be met.

Findings: Chapters 33.651 through 33.654 address water service standards, sanitary sewer disposal standards, stormwater management, utilities and rights of way.

• The water standards of 33.651 have been verified. An existing 6" inch water main is located in SE Boise Street. An existing 5/8" metered service is located 50' east of SE 118th Place serves the existing house on Parcel 2. However, it crosses Parcel 3. Title 21 requires that meters be located within the public right-of-way adjacent to the property they serve. Therefore, new metered water service for Parcel 2 must be installed. Service

is available either from the main in SE Boise Street, or from a 6" main in SE 118th Place. See Exhibit E-3 for more details.

- The sanitary sewer standards of 33.652 have been verified. There is an existing 8-inch PVC public sanitary sewer located in SE 118th Place that can serve the sanitary needs of the proposed lots. There are no plumbing permit records to confirm that the existing house was connected to the public sewer system. Therefore evidence of the connection and of the location of the sewer line must be submitted. This can be accomplished by either a sewer scope video or a sewer line locate based on metal tracer wire detection and a dye test. If the connection crosses the proposed property line, the applicant must either obtain a plumbing permit to cap the existing sewer connection and establish a new service for the house located entirely on Parcel 2, or provide an easement for the sewer line on the Final Plat. If an easement is provided, a Maintenance Agreement for the easement must be submitted for approval by BDS and the City Attorney and must be recorded with the Final Plat. If a new sewer connection is established for the house, all plumbing permits must receive final inspection approval prior to Final Plat approval. See Exhibit E-1 and E-5 for more details.
- The technical standards of Chapter 33.653 related to stormwater management have been verified. The findings below for the Stormwater Management Approval Criteria of 33.653.020 incorporate a discussion of how the technical standards have been satisfied by the applicant's stormwater proposal.
- Chapter 33.654 includes technical standards related to proposed public and private rights of way, including improvements within streets, pedestrian connections, common greens, and alleys. However, no new streets, pedestrian connections, common greens, or alleys are proposed or required within the land division site. As result, the remaining standards and approval criteria related to street connectivity, location, and design are met or not applicable.

33.653.020 Stormwater Management Approval Criteria

- A. If a stormwater tract is proposed or required, an adequate amount of land and an appropriate location must be designated on the Preliminary Plan; and
- B. The application must show that a stormwater management system can be designed that will provide adequate capacity for the expected amount of stormwater.

Findings: No stormwater tract is proposed or required. Therefore, criterion A is not applicable.

The City of Portland requires that stormwater from development be cleaned and disposed of in a manner that meets the requirements of the City's <u>Stormwater Management Manual</u>. In order to meet this approval criterion, land division proposals must demonstrate an approved method of cleaning (water quality treatment), detention (delayed release), and an approved disposal point.

The <u>Stormwater Management Manual</u> contains a hierarchy of acceptable methods of stormwater treatment and disposal. The hierarchy requires that applicants first explore the use of methods that have a lower potential impact on groundwater, such as on-site surface infiltration swales and infiltration planters. If these methods are not feasible on a site, applicants may move lower on the hierarchy, to methods that inject water deeper into the ground through mechanical devices such as drywells or sumps, or carry it off of the site into storm sewers, drainageways, or other approved disposal points.

In addition to determining appropriate treatment and disposal methods by working through the hierarchy in the <u>Stormwater Management Manual</u>, stormwater facilities must be sized, through engineering calculations, to accommodate the expected amounts of stormwater. In some cases, sizing a stormwater facility necessitates testing the infiltration rate of the soil at the site.

The applicant has proposed new drywells on Parcels 1 and 3 and to retain the existing downspouts and splashblocks on Parcel 2 for stormwater management methods (Exhibit C.2) and the Bureaus have responded as follows (Exhibits E-1 and E-5)

- **Public Street Improvements:** As a condition of this land use approval, the Office of Transportation requires the applicant to improve the frontage of the site to City standards (discussed earlier in this report). A new sidewalk is required, but the curb already exists. BES has indicated that the sidewalk must be constructed so that it will slope towards the planter strip, allowing the stormwater runoff from the sidewalk to be deposited in a vegetated area, which meets the requirements of the Stormwater Management Manual.
- **Parcels 1 and 3:** Stormwater from these lots will be directed to individual drywells that will treat the water and slowly infiltrate it into the ground. Each of these lots has sufficient area for a stormwater facility that can be adequately sized and located to meet setback standards, and accommodate water from a reasonably-sized home. Drywells may not be located any closer than 10 feet to structures (including those on adjacent properties) and 5 feet to property lines. Site Development has indicated conceptual approval of the drywells.
- Parcel 2 (the lot with the existing house): The existing house has downspouts that drain onto either the ground or splashblocks. The location of the downspouts does not meet minimum setback requirements for the new lot lines. Site Development has noted that the stormwater management for Parcel 2 must be retrofitted in order to comply with the Stormwater Management Manual. Prior to final plat approval, a plumbing permit to install new rain drains and a drywell located outside the required setbacks must be obtained and finaled.

With the conditions of approval described above, the stormwater management criteria are met. As shown by the findings above, the Services and Utilities criteria are met.

DEVELOPMENT STANDARDS

General Information about Development Standards and Approval Criteria. The Zoning Code contains two types of regulations: Development standards and Approval criteria.

Approval criteria, such as those listed earlier in this report, are administered through a land use review process. Approval criteria are regulations where the decision-maker must exercise discretion to determine if the regulation is met. Public notice is provided and public comments received that address the approval criteria are addressed in the decision.

Development Standards: Development standards are clear and objective regulations (for example: building setbacks; number of required parking spaces; and maximum floor area). Compliance with development standards is reviewed as part of the administrative permitting process and are not considered to be discretionary reviews. Development standards that are not relevant to the land division review, have not been addressed in the review, but will have to be met at the time that each of the proposed lots is developed.

Section 33.120.270.D of the Zoning Code allows reduced side setbacks (3-feet from property lines) for detached houses in the multi-dwelling zones on lots that are at least 25 feet wide. This allowance only applies to the setbacks that are interior to the site. The setbacks around the perimeter of the land division site are that of the base zone. This proposal is eligible to use these provisions. To take advantage of this allowance the reduced side setbacks must be shown on a supplemental survey for the land division at the time of final plat approval.

Existing development that will remain after the land division. The existing development on the site will remain and be located on Parcel 2. The division of the property may not cause the structures to move out of conformance or further out of conformance to any development standard applicable in the R2 zone (Please see section on Other Technical Standards for Building Code standards.)

In this case, there are several Zoning Code standards that relate to existing development on the site:

- <u>Minimum Setbacks</u> The existing house identified to remain on the site must meet the required Zoning Code setbacks from the proposed <u>new</u> lot lines. Alternatively, existing buildings must be set back from the new lot lines in conformance with an approved Adjustment or other Land Use Review decision that specifically approves alternative setbacks. The existing house will be 4.5 feet from the new property line. As discussed above, the existing development on the site is able to have setbacks of a minimum of 3' because the lot widths are at least 25'. Therefore, the required setbacks are being met. To ensure this standard continues to be met at the final plat stage, the final plat must be accompanied by a supplemental survey showing the location of the existing building relative to the adjacent new lot lines.
- Accessory Structures In this zone, accessory structures are not allowed on a lot without a primary structure. Therefore, in order for the proposed new lots to meet this standard, the shed on Parcel 1 must be removed prior to final plat. Demolition permits are required. The applicant must provide documentation prior to final plat approval that all required demolition permits have received final inspection. Alternately, the applicant can execute a covenant with the City stating that the structures will be removed if a primary structure has not received final inspection on the lot(s) with the accessory structure(s) within two years of final plat approval. The covenant must be recorded with Multnomah County prior to final plat approval. To ensure that this standard is met, a condition of approval is necessary.
- <u>Main Entrances</u> -- In this zone, the main entrance of residential structures must face a street, or open onto a porch that faces the street. The main entrance for the existing house that will remain on Parcel 2 currently faces SE Boise Street. Because a new lot will be created between Parcel 2 and SE Boise Street, the main entrance on the existing house must be modified to face SE 118th Place. Therefore, prior to final plat approval, the applicant must finalize a building permit to make modifications to the house that will remain on Parcel 2 to demonstrate continued compliance with 33.120.231.C after the land division is recorded. Title 33 defines the Main Entrance as the entrance that most pedestrians are expected to use. Therefore, there must be a clear pathway to the main entrance, and the main entrance must open into a common living area, not a bedroom or bathroom. To ensure that this standard is met, a condition of approval is necessary.
- The existing driveway serving Parcel 2 crosses over portions of Parcel 3. The portion of the driveway located on Parcel 2 does meet the minimum driveway width of 9'. To prevent future conflicts regarding use of the portion of the driveway located on Parcel 3, either an easement for the benefit of Parcel 2 must be executed, or those portions of the driveway must be removed. If the portions of the driveway located on Parcel 3 are removed, the revised location of the driveway must be shown on the supplemental plan at time of final plat. If an easement is pursued, the easement and a recording block for the easement must be shown on the plat and a maintenance agreement must be submitted. The applicant may also choose to make the easement a Reciprocal Access Easement if future development on Parcel 3 is intended to be served by the existing driveway on Parcel 2. To ensure that this standard is met, a condition of approval is necessary.

With the conditions noted above, this land division proposal can meet the requirements of 33.700.015.

OTHER TECHNICAL REQUIREMENTS

Technical decisions have been made as part of this review process. These decisions have been made based on other City Titles, adopted technical manuals, and the technical expertise of appropriate service agencies. These related technical decisions are not considered land use actions. If future technical decisions result in changes that bring the project out of conformance with this land use decision, a new land use review may be required. The following is a summary of technical service standards applicable to this preliminary partition proposal.

Bureau	Code	Topic	Contact Information	
	Authority			
Water Works	Title 21	Water	503-823-7404	
		availability	http://www.water.ci.portland.or.us/	
Environmental	Title 17; 2002	Sewer	503-823-7740	
Services	Stormwater	availability	http://www.bes.ci.portland.or.us/	
	Manual	Stormwater		
		Management		
Fire Bureau	Title 31	Emergency	503-823-3700	
	Policy B-1	Access	http://www.fire.ci.portland.or.us/	
Transportation	Title 17,	Design of public	503-823-5185	
	Transportation	street	http://www.trans.ci.portland.or.us/	
	System Plan			
Development	Titles 24 –27,	Building Code,	503-823-7300	
Services	Admin Rules for	Erosion Control,	http://www.bds.ci.portland.or.us.	
	Private Rights	Flood plain, Site		
	of Way	Development &		
		Private Streets		

As authorized in Section 33.800.070 of the Zoning Code conditions of approval related to these technical standards have been included in the Administrative Decision on this proposal.

- The applicant must meet the requirements of Urban Forestry for street tree planting in the existing planter strip adjacent to Parcel 2 prior to final plat approval and after street improvements are completed. This requirement is based on the standards of Title 20.
- The applicant must demonstrate that building walls less than 3' feet from a proposed property line must be one-hour fire-rated construction with no openings allowed. Also, eaves less than 3' from a property line must be protected on the underside as required for one-hour fire rated construction. Finally, roofs and eaves may not project closer than two feet from a property line. These requirements are based on Title 24. The applicant has provided a supplemental plan showing that all building walls are more than 3' from all proposed property lines. In addition, the supplemental plan shows the eaves 32" from the property lines. Therefore, the eaves must be protected on the underside for one-hour fire-rated construction. Alternately, a building permit may be obtained to remove at least 4" from the eaves, so they are at least 3' from the proposed property lines, or the locations of the property lines may be relocated so that the eaves are at least 3' from the proposed property lines. If the latter option is chosen, the lot width and depth may not increase or decrease by more than 5% and any lot area may not decrease my more than 5%. This requirement is based on the standards for approval of final plats in Title 33.
- Buildings or portions of buildings exceeding 30 feet in height above the lowest level of fire department vehicle access shall be provided with approved fire apparatus access roads capable of accommodating fire department aerial apparatus. This requirement will be enforced at time of building permit application for new construction.

The applicant has proposed a 3 lot partition, as shown on the attached preliminary plan (Exhibit C.1). As discussed in this report, the relevant standards and approval criteria have been met, or can be met with conditions. The primary issues identified with this proposal relate to right-of-way improvements, adequate provision of utilities, and tree mitigation.

With conditions of approval that address these requirements this proposal can be approved.

ADMINISTRATIVE DECISION

Approval of a Preliminary Plan for a 3-lot partition, that will result in 3 lots for detached houses as illustrated with Exhibit C.1, subject to the following conditions:

- **A. Supplemental Plan.** Three copies of an additional supplemental plan shall be submitted with the final plat survey. That plan must portray how the conditions of approval listed below are met. In addition, the supplemental plan must show the surveyed location of the following:
 - Any buildings or accessory structures on the site at the time of the final plat application;
 - Any driveways and off-street vehicle parking areas on the site at the time of the final plat application;
 - The proposed interior side setbacks for all of the lots if the reduced setback provisions of Section 33.120.270.D.1 are intended to be used.
 - Any other information specifically noted in the conditions listed below.

B. The final plat must show the following:

- 1. If the existing driveway serving Parcel 2 is to remain crossing over portions of Parcel 3, an Access Easement shall be shown and labeled on the final plat. If the existing driveway serving Parcel 2 is also intended to serve future development on Parcel 3, the easement should be a Reciprocal Access Easement. The easement shall allow use of this area for all of the purposes that a driveway would be typically used for.
- 2. If a private sanitary sewer easement is required after determining the exact location of the sanitary sewer serving Parcel 2, a 10' wide private sanity sewer easement for the benefit of Parcel 2, shall be shown and labeled over the relevant portions of Parcel 1.
- 3. A recording block for each of the legal documents such as maintenance agreement(s), acknowledgement of special land use conditions, or Declarations of Covenants, Conditions, and Restrictions (CC&Rs) as required by Condition C.5 and C.11 below. The recording block(s) shall, at a minimum, include language substantially similar to the following example: "A Declaration of Maintenance Agreement for private sanitary sewer easement) has been recorded as document no. _______, Multnomah County Deed Records."

C. The following must occur prior to Final Plat approval:

Streets

- 1. The applicant shall meet requirements of the City Engineer for right of way improvements along the frontages of both SE Boise Street and SE 118th Place. The applicant must obtain an approved Right Of Way permit from the Bureau of Transportation Engineering and Development Review to install the required sidewalk and planter strip. The improvements along both frontages of Parcel 2, where the existing house will be retained, must be constructed prior to final plat approval.
- 2. "No Parking" signs must be posted along both the SE Boise Street and SE 118th Place frontages.

3. The existing fence must be brought into conformance with the fence height and location standards of Title 17 and Title 33.

Utilities

- 4. The applicant shall meet the sewer line documentation requirements described by the Site Development Section of the Bureau of Development Services in Exhibit E.5 to demonstrate the connection of the existing house on Parcel 2 and the location of the sewer line.
- 5. If the sewer line serving the existing house on Parcel 2 crosses over Parcel 1 or 3, a 10'-wide private sanitary sewer easement is required over the relevant portions of either Parcel 1 or 3.
- 6. The applicant shall meet the requirements of the Site Development Section of the Bureau of Development Services for the decommissioning of the existing septic system on the site.
- 7. The applicant shall meet the requirements of the Water Bureau concerning relocation of the water service connection to the existing home.

Existing Development

- 8. The applicant must obtain a finalized demolition permit for removing the shed on Lot Parcel 2. Alternately, the applicant can execute a covenant with the City stating that the structure will be removed if a primary structure has not received final inspection on the lot(s) with the accessory structure(s) within two years of final plat approval. The covenant must be recorded with Multnomah County prior to final plat approval.
- 9. The requirements of Title 24 for fire protection of the eaves on the existing house that are proposed to be closer than 3' to the new property lines must be addressed. This can be addressed in one of the following three ways:
 - First, the underside of the eaves closer than 3' to the property line must be protected on the underside for one-hour fire-rated construction. To pursue this option a building permit must be obtained and finaled;
 - Second, the eaves may be modified so that they are at least 3' from the property lines. To pursue this option, a building permit must be obtained and finaled; or
 - The locations of the property lines may be relocated so that the eaves are at least 3' from the proposed property lines at time of final plat application. If this option is chosen the lot width and depth may not increase or decrease by more than 5% and any lot area may not decrease my more than 5%.
- 10. The applicant must obtain a finalized building permit for modifications to the existing house that will remain on proposed Parcel 2 that demonstrate compliance with 33.120.231.C, Main Entrances in the Multi-Dwelling zones. To ensure the new entrance meets the definition of Main Entrance, there must be a clear pathway to the main entrance, and the main entrance must open into a common living area, not a bedroom or bathroom.
- 11. The portions of the existing driveway serving Parcel 2 that cross over Parcel 3 must be removed and the new configuration shown on the supplemental plan submitted at time of final plat application. Alternately, an access easement over those portions of the driveway for the benefit of Parcel 2 may be pursued. If the driveway is to be used by future development on Parcel 3, the easement should be a Reciprocal Access Easement.
- 12. The applicant must meet the requirements of Site Development for the stormwater systems on the existing house to remain on Parcel 2. Specifically, the gutters and downspouts must function properly, and they must direct water to a drywell that meets

- setback requirements from the new lot lines. The applicant must obtain finalized plumbing permits for this work prior to final plat approval.
- 13. The applicant must plant one 2" tree to be planted on Parcel 2, the lot with the existing house, prior to final plat approval. A Zoning Permit must be obtained, and receive final inspection approval verifying this tree has been planted.
- 14. The applicant must plant street trees in the public right-of-way adjacent to Parcel 2. The applicant must contact Urban Forestry at 503-823-4018 prior to selecting trees to discuss the species of trees that are permitted and to obtain the planting permit. Urban Forestry must inspect and approve the newly planted trees prior to final plat approval.

Required Legal Documents

15. A Maintenance Agreement shall be executed for the Private Sanitary Sewer Easement, and Access Easement or Reciprocal Access Easement, if those easements are required. The agreement shall include provisions assigning maintenance responsibilities for the easement area and any shared facilities within that area, consistent with the purpose of the easement, and all applicable City Code standards. The agreement must be reviewed by the City Attorney and the Bureau of Development Services, and approved as to form, prior to final plat approval.

Other requirements

16. Street trees must be planted in the right-of-way of SE 118th Place adjacent to Parcel 2 after street improvements adjacent to Parcel 2 are completed.

D. The following conditions are applicable to site preparation and the development of individual lots:

- 1. One minimum 2" tree must be planted on Parcel 3. One minimum 2" tree and one minimum 1.5" tree must be to be planted on Parcel 1. These trees may count toward the T1 standard of Chapter 33.248.
- 2. The applicant shall meet the requirements of the City Engineer for right of way improvements along the frontages of SE Boise Street and SE 118th Place adjacent to Parcels 2 and 3.
- 3. Buildings or portions of buildings exceeding 30 feet in height above the lowest level of fire department vehicle access shall be provided with approved fire apparatus access roads capable of accommodating fire department aerial apparatus as determined by the Fire Bureau.

Decision rendered by: _______ on August 25, 2008

By authority of the Director of the Bureau of Development Services

Decision mailed August 28, 2008

Staff Planner: Emily Hughes

About this Decision. This land use decision is **not a permit** for development. A Final Plat must be completed and recorded before the proposed lots can be sold or developed. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

Procedural Information. The application for this land use review was submitted on May 2, 2008, and was determined to be complete on July 10, 2008.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on May 2, 2008.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant did not waive or extend the 120-day review period.

Some of the information contained in this report was provided by the applicant. As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the decision of the Bureau of Development Services with input from other City and public agencies.

Conditions of Approval. If approved, this project may be subject to a number of specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans, and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term "applicant" includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

This decision, and any conditions associated with it, is final. It may be appealed to the Oregon Land Use Board of Appeals (LUBA), within 21 days of the date the decision is mailed, as specified in the Oregon Revised Statute (ORS) 197.830. Among other things, ORS 197.830 requires that a petitioner at LUBA must have submitted written testimony during the comment period for this land use review. You may call LUBA at 1-503-373-1265 for further information on filing an appeal.

The file and all evidence on this case is available for your review by appointment. Please contact the receptionist at 503-823-7967 to schedule an appointment. Copies of all information in the file can be obtained for a fee equal to the cost for such services. You may also find additional information about the City of Portland and City Bureaus, as well as a digital copy of the Portland Zoning Code, by visiting the City's homepage on the Internet at www.portlandonline.com.

Recording the land division. The final land division plat must be submitted to the City within three years of the date of the City's final approval of the preliminary plan. This final plat must be recorded with the County Recorder and Assessors Office after it is signed by the Planning Director or delegate, the City Engineer, and the City Land Use Hearings Officer, and approved by the County Surveyor. The approved preliminary plan will expire unless a final plat is submitted within three years of the date of the City's approval of the preliminary plan.

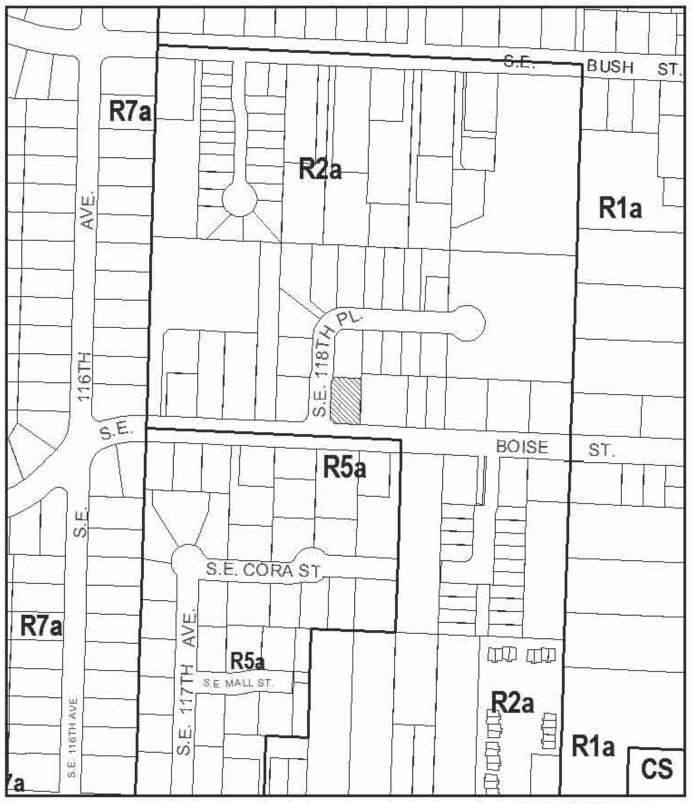
EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Stormwater plan
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Bureau of Environmental Services
 - 2. Bureau of Transportation Engineering and Development Review
 - Water Bureau
 Fire Bureau

 - 5. Site Development Review Section of BDS
 - 6. Bureau of Parks, Forestry Division
 - 7. Life Safety Section of BDS
- F. Correspondence:
 - 1. Anne E Freiberg, 7/23/08, letter with concerns
 - 2. Melanie and Jose Landeros, 8/11/08, letter with concerns
- G. Other:
 - 1. Original LU Application
 - 2. Site History Research
 - 3. Arborist Report

The Bureau of Development Services is committed to providing equal access to information and hearings. If you need special accommodations, please call 503-823-0625 (TTY 503-823-6868).



ZONING Ste

LU 08-126577 LDP File No. 3442 1/4 Section. 1 inch = 200 feet Scale. 1S2E10DD 900 State Id . В (May 06,2008) Exhibit.



